Exhibit 68

Plaintiffs' Corrected Averment of Jurisdictional Facts and Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank Pursuant to Rule 56.1

CENTRAL INTELLIGENCE AGENCY

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1 July 2002

Al-Qa'ida Still Well Positioned To Recruit Terrorists

CTC 2002-40081CH

Al-Qa'ida Still Well Positioned To Recruit Terrorists

Summary (U)

Despite the loss of its recruitment and training center in Afghanistan, al-Qa'ida still can recruit terrorists by relying more on its resources outside Afghanistan, and by exploiting those of extremist groups and like-minded Islamic nongovernmental organizations (NGOs).

- The estimated 10,000-15,000 men trained in al-Qa'ida's Afghan camps since 1996 are dispersed around the world some serving as recruiters and trainers in other countries.
- Al-Qa'ida and al-Qa'ida associates have recruited in mosques, madrassas, and other Islamic gathering places worldwide. One al-Qa'ida recruiter, for example, operated out of Spain until his arrest in November.
- Al-Qa'ida has cultivated an extensive network of contacts with other terrorist and extremist groups and Islamic NGOs, many of which have extensive mechanisms for recruitment, training, and indoctrination that terrorists have exploited in the past.

The number of young men attracted to Islamic extremist groups—the potential recruitment pool for al-Qa'ida probably increased in the wake of the 11 September attacks. Attendance at radical mosques has increased, and sermons from senior religious figures in key Arab states increasingly are hostile to the United States.

 however, recently complained that losses in Afghanistan and disruption efforts have made al-Qa'ida's propaganda effort more difficult.

To shield its recruitment efforts in the face of the global antiterrorist campaign, al-Qa'ida is likely to adopt a more decentralized, covert recruitment program. The organization may set up new NGOs or businesses for the purposes of recruitment and make more sophisticated use of the Internet to attract, vet, and train new members.

Such a program is more conducive to recruiting for terrorist operations
than it is for attracting and training large numbers of foot soldiers for
paramilitary operations and leaves open the option that al-Qa'ida could
evolve into an organization even more focused on terrorist activities.

Over the long term, decentralized recruitment and training programs could weaken group cohesion and dilute al-Qa'ida's global, anti-US focus. Al-Qa'ida's proselytization effort may further suffer if the group loses its status as a premier terrorist organization, for example, by failing to pull off another successful attack against the United States.

Al-Qa'ida Still Well Positioned To Recruit Terrorists

Large-Scale Recruitment and Training Base Lost (U)

Afghanistan served as a nexus where al-Qa'ida recruiters could scout for new members among the thousands of *mujahidin*—holy warriors—who traveled to the country to train for participation in jihads in Chechnya, Bosnia, Kashmir, and elsewhere. Al-Qa'ida used Afghanistan to select and train an estimated 10,000-15,000 men since 1996. The scale and sophistication of this effort will be difficult to replicate elsewhere. Afghanistan allowed al-Qa'ida to recruit for terrorist operations and for its paramilitary forces.

- The shared experience of training in Afghanistan broadened and strengthened terrorist and extremist networks, built trust, and provided terrorists exploitable contacts with a wide variety of Islamic groups that sponsored travel to Afghanistan.
- Afghanistan also provided a safe place where senior al-Qa'ida members could meet and pass judgment on new recruits. The group could build bonds of trust between individuals, isolate recruits for conditioning, and conduct military and operational training undisturbed by local authorities.

Recruitment Resources Outside Afghanistan (U)

Al-Qa'ida's past success and experience in Afghanistan put it in a good position to continue recruiting on a smaller scale elsewhere. Graduates of al-Qa'ida camps are dispersed around the world some serving as recruiters and trainers in other countries. Al-Qa'ida members fleeing Afghanistan

have reinforced these numbers,

Moreover, al-Qa'ida's multistage recruitment effort was not limited to Afghanistan. The organization or its associates—often recruited prospective members in Islamic gathering places in the Middle East, Europe, and elsewhere, and arranged their clandestine travel to Afghanistan for further vetting, indoctrination, and training.

for example,
'Umar Mahmud 'Uthman, a.k.a. Abu Qatada, was a
key *mujahidin* recruiter who used his London
mosque as a base from which to direct the
recruitment of European-based Arabs for camps in
Afghanistan.



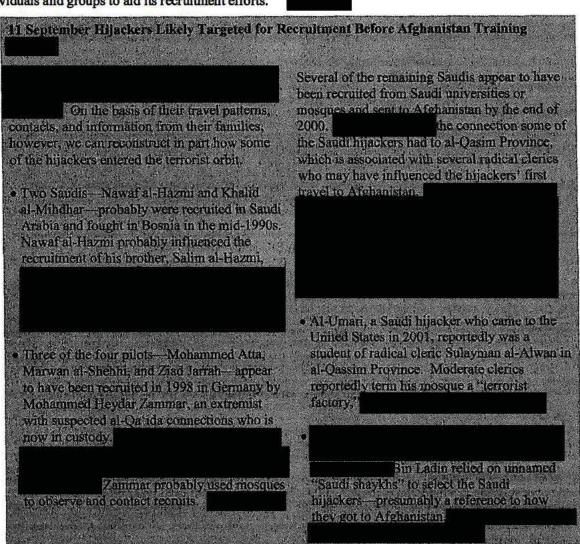
Many of the forces that draw young men towards al-Qa'ida's orbit are outside the organization itself and therefore less subject to the constraints imposed by the antiterrorist campaign. Such influences include radical Islamic clerics, extremist propaganda organizations, and a wide range of Islamic nongovernmental organizations (NGOs) that focus on recruiting and indoctrinating youth with a fundamentalist Islamic ideology. Al-Qa'ida can turn to an extensive network of contacts with such

This assessment was prepared by the DCI Counterterrorist Center's Office of Terrorism Analysis.

Comments and queries are welcome and may be directed to the Chief,

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individuals and groups to aid its recruitment efforts.



Willing Recruits Still Available (U)

The number of young men attracted to Islamic extremist groups the potential recruitment pool for al-Qa'ida probably increased in the wake of the 11 September attacks. Unrest in the Middle East, US airstrikes in Afghanistan, and perceptions that the global counterterrorism campaign is anti-Muslim

fueled anti-US sentiment among many young Muslims.

- Radical mosques in Europe enjoyed significant increases in attendees after the US started bombing Afghanistan, according to press reporting.
- New websites sprang up to promote the theory that the United States commissioned the 11 September attacks to justify attacks on Muslims. Other sites

were set up to enlist suicide bombers for anti-US, as well as anti-Israeli attacks,

- According to press reporting from April, La Voix des Opprimes ("Voice of the Oppressed") was inundated with requests for copies of an al-Qa'ida recruitment video, which can be viewed on its website.
- A message of hatred for the United States is increasingly evident in the Friday sermons of even mainstream clerics in Arab countries. Sermons with an unprecedented level of anti-US rhetoric are being broadcast over official radio and television stations.

Al-Qa'ida has continued to press its pre-11 September themes: the United States and Jews are the main enemies of all Muslims; the plight of the Palestinians is part of the onslaught against Muslims; global jihad is the duty of every good Muslim, and martyrdom for the cause is a method of resistance sanctioned by God. Al-Qa'ida terrorist operatives have served as spokesmen for the organization.

- The latest al-Qa'ida recruiting video, "New Crusade," released in April, featured a recording of 11 September hijackers Ahmad al-Haznawi al-Jarrah.
- Accused terrorist Zacarias Moussaoui recently delivered an articulate 50-minute English-language statement of the al-Qa'ida message to the US District Court in Alexandria.

There are signs, however, that support for the extremist message has begun to wane in some quarters.

A Mix of Strategies Required for Successful Adaptation (U)

To tap into the pool of potential recruits, al-Qa'ida will have to adapt its recruitment program, decentralizing more of the vetting, indoctrination, and training of new members—perhaps drawing on the resources of Islamic NGOs, extremist organizations, and associated terrorist groups—as well as increasing its use of the Internet. Al-Qa'ida could use a variety of venues to recruit and frequently change sites—for example switching from one mosque to another—to stay ahead of disruption efforts.

Exploiting Islamic Recruitment Organizations

Al-Qa'ida's need to lower its profile has led it increasingly to exploit the local and international recruitment mechanisms of a wide range of Islamic organizations that support *mujahidin* recruitment. A number of Islamic organizations mobilize and screen young men and indoctrinate them in an anti-US and Islamic extremist ideology, and some provide paramilitary training. Only a small fraction of individuals indoctrinated in these groups will go on to join terrorist organizations. Terrorist groups have exploited the organizations for recruitment because they target the same general demographic group and recruit in similar ways.

Jama'at al-Tabligh (JT), a missionary organization
with a peaceful charter, has a presence in more than
60 countries and attracts more than one million to
its annual meeting near Lahore, Pakistan. Extremist
elements have infiltrated parts of the organization.

the JT as the first step in their involvement with the extremist movement,

Extremist Groups Can Be Resource for Terrorists

Some Islamic groups, such as Jama'at al-Tabligh and Hizb al-Tahrir, are organized in a decentralized, clandestine cell structure, which makes them more vulnerable to infiltration by terrorist groups but more resilient in the face of crackdowns. Terrorists may recruit from these groups or use them as a cover for their activities without the knowledge or consent of other parts of the organization.

 The organizations recruit in much the same manner as terrorist groups, carefully observing, screening, and testing candidates, conducting extensive background investigations, and requiring that new members take an oath of lovalty.

Several Islamic organizations target young.
Muslims with the characteristics most sought after by terrorist groups; education, ability to blend into Western society, and fundamentalist religious views. Young disaffected Muslim emigrants to Western countries are a prime target group.

- Al-Muhajiroun and HT recruit in British universities, taking advantage of significant increases in students from Pakistan, Bangladesh, and Saudi Arabia, according to press reporting. Both groups have now been banned from campuses in the UK for incring racial hatred, but according to press, al-Muhajiroun continues to give talks on campus under other names, and HT literature is still available in Islamic reading rooms at universities.
- Groups such as the World Association for Muslim Youth observe students in schools and offer scholarships for religious training in the Middle East.

A number of Islamic NGOs—including those with connections to al-Qa'ida—support educational programs that can provide recruits with access to facilities for paramilitary training.

- According to press reporting al-Muhajiroun worked with Sakina Security Services to provide paramilitary training, including courses in hand-to-hand combat, explosives, and weapons construction in "private camps" in Nigeria, South Africa, and two former Soviet republics UK authorities have arrested the head of Sakina and shut down its website. According to press reporting, some recruits are sent to the United States for training in mark smanship because of liberal US gun laws.
- training camps including a large camp near youths training.
 training at such camps included weapons handling, firing, and explosives

 Training appears to be sponsored by various NGOs, including the World Association of Muslim Youth and the Foundation of Islamic Tarbiya (education)
- e According to recent press
 reporting, the Belgian Islamic Center (Centre
 Islamique Belge or CIB), a mosque in Brussels,
 Belgium, served as a channel to direct
 fundamentalists to Afghanistan. The CIB is
 home to the Muslim Scouts of Belgium, a youth
 organization that has organized paramilitary
 training camps in the Ardennes and served as
 an intermediary for sending voting Muslims to
 Medina, Saudi Arabia.

Extremist proselytizing groups, such as **Hizb al-Tahrir** (HT) and **al-Muhajiroun**—both with
offices in the United Kingdom—espouse violent,
anti-US rhetoric and also have served as a point of
entry into the jihadist movement.

HT has branches in London,
Lebanon, Syria, Jordan, Egypt, the Arabian
Peninsula, Europe, North America, Central Asia, and
South Asia. Al-Mujahiroun, an offshoot of HT,
claims a membership of 2,000 in the United Kingdom
and has branches in Pakistan, Lebanon, and the
United States,

 In the Balkans, local offices of NGOs such as the World Assembly of Muslim Youth, al-Haramayn, Society for the Revival and Islamic Heritage, and al-Waqf al-Islamiya were actively involved in spotting and assessing suitable terrorist recruits from among young men who seek assistance from humanitarian organizations,

Setting Up New NGOs (U)

Since 11 September, terrorist and extremist groups have benefited from a changing roster of Islamic organizations. Some extremist organizations have changed their names in response to crackdowns from authorities, and a number of new NGOs have emerged, providing terrorist groups an opportunity to "get lost" or hide within the large network of organizations. Sometimes terrorist or extremist groups take over legitimate NGOs or set up new NGOs, youth organizations, or businesses for training and recruitment.

 The Islamic Dawa Council of the Philippines, a radical Islamic organization, is helping to fund the establishment of Muslim youth organizations to

A portion of the funds will go towards the printing of anti-US propaganda materials.

number of new NGOs with Saudi Arabian, Sudanese, or Egyptian sponsors have emerged recently in Comoros. The NGOs are setting up offices and training centers targeting local youth.

the Jamaatu Ibador Ibadu Rahmane (JIR) Islamic Society of Senegal took over administration of a small NGO, firing its employees and replacing them with militant members of JIR and another radical Sengalese group. The group began soliciting support for the construction of six new mosques in Dakar to serve as recruiting and fundraising centers.

Internet Increasingly a Recruitment Tool (S//NF)

In the post-11 September security environment al-Qa'ida may be turning increasingly to the Internet as an avenue for recruitment. Web sites, chat rooms, and e-mail may be used to spread al-Qa'ida's message, generate support, and identify a pool of potential recruits.

 Many web sites supported by or sympathetic to al-Qa'ida provide chat rooms—where many participants support jihad and advocate specific terrorist acts—which could be used to observe and approach prospective recruits. Al-Qa'ida may use the Internet to disseminate jihad training materials to new recruits to fill the gap created by the destruction of key training camps. Chat room messages in January and February announced the creation of virtual training rooms because of "the difficulty of travel for many people at the present time" and to replace camps lost in Afghanistan, according to Internet analysis.

- One new training room known as the virtual "Faruq Camp" will provide lessons in jihad and administrative affairs, as well as physical and military training. The planned curriculum covers basic mujahidin military training, combat skills, orienteering, and demolitions.
- "Training City" a virtual site for "al-Qa'da members, ulema, and other sympathizers," appeared in March. According to the site, its aim is to provide "psychological preparation" for becoming mujahidin and "field (military) training."
- Several Web sites currently offer complete or partial versions of the Encyclopedia Jihad—a training manual al-Qa'ida associates and other mujahidin developed detailing chemical, biological, and conventional weapons production. (U//FOUO)

Implications for the Organization (U)

A decentralized, more covert recruitment and training program is more appropriate for recruiting terrorist operatives than for recruiting mujahidin fighters, suggesting that al-Qa'ida could evolve into a more traditional terrorist organization rather than a terrorist/paramilitary organization. Even on the run, al-Qa'ida probably is capable of conducting an effective, small-scale, targeted terrorist recruitment effort aimed at individuals with special skills or a particular profile—US converts to Islam, for example. The new security environment is less conducive to recruiting, indoctrinating, and training large numbers of foot soldiers. Indeed, such a process would leave al-Qa'ida more vulnerable to counterterrorist measures.

Al-Qa'ida Bent on Recruiting US Citizens

Al-Qa'ida has recruited a handful of US citizens and will my to enlist more to conduct operations without raising suspicion.

selecting recruits for advanced terrorist training who speak English, are of European ancestry, or have US or Western European passports. Bin Ladin's now deceased deputy Muhammad 'Atif oversaw the selection of these operatives and monitored their training, an indication of the group's intense interest in these individuals.

Bin Ladin in October advised al-Jazirah television.
 "That which is coming in the future will be greater and more serious, and the Arabs will not have anything to do with it."

low detained US offizen and Muslim convert.

Jose Padilla.

Al-Qa'ida seems to prefer individuals whose appearance would allow them to blend into Western society, but naturalized US citizens of Middle Eastern or South Asian descent may be tapped for terrorist activity because of their freedom of access.

Mukhtar al-Baluchi, a.k.a. "the Brain," has a Washington, DC-based Pakistani operational assistant who is married to a Pakistani woman.

 Al-Qa'ida member Khalil Deek, a naturalized US citizen of Palestinian descent for his role in the thwarted millennum attacks. Although the organization will continue to attract recruits for its terrorist operations, its likely reliance on smaller facilities and virtual means of instruction suggests training probably will not be as thorough or sophisticated as that available in Afghanistan.



Over the long term, a decentralized recruitment and training program may weaken group cohesion and trust and dilute al-Qa'ida's global, anti-US focus. Increased pressure on terrorist organizations will make the kind of personal contact that built ties of trust and loyalty between the organization's senior leadership and new recruits in Afghanistan risky and less practical. Loyalty to cell leaders might increase, while ties to the central leadership weaken. The organization also may eventually lose a common reference point and perhaps a uniform approach to recruitment and training.



Al-Qa'ida's recruitment and training effort could falter if the group loses its status as a premier terrorist organization, for example, by failing to pull off another successful attack against the United States. Under this scenario, al-Qa'ida would risk losing support needed to fund travel and training for new recruits.

- Al-Qa'ida's ability to attract support, however, could gain momentum following the release of a new Bin Ladin video with recent footage.
- Any Coalition actions that increase the perception that the counterterrorist campaign is anti-Muslim such as military strikes against a Muslim country would increase the pool of young men willing to undertake terrorist action against the United States.

